



0000106143

KENZ D. JENNINGS  
COMMISSIONER

OPEN MEETING ITEM



ARIZONA CORPORATION COMMISSION

JACK ROSE  
EXECUTIVE SECRETARYRECEIVED  
AZ CORP COMMISSION

Aug 15 2 45 PM '97

DOCUMENT CONTROL

DATE: August 15, 1997

DOCKET NO: U-3175-96-479; E-1051-96-479, U-2428-96-417 and E-1051-96-417

TO ALL PARTIES:

Enclosed please find the recommendation of Arbitrators Jerry Rudibaugh, Barbara M. Behun and Scott S. Wakefield. The recommendation has been filed in the form of an Order on:

MCIMETRO ACCESS TRANSMISSION SERVICES, INC.; AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND U S WEST COMMUNICATIONS, INC.  
(ARBITRATION)

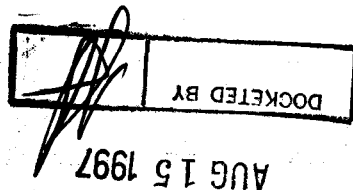
Pursuant to A.A.C. R14-3-110(B), you may file exceptions to the recommendation of the Hearing Officer by filing an original and ten (10) copies of the exceptions with the Commission's Docket Control at the address listed below by 4:00 p.m. on or before:

AUGUST 25, 1997

The enclosed is NOT an order of the Commission, but a recommendation of the Hearing Officer to the Commissioners. Consideration of this matter has tentatively been scheduled for the Commission's Working Session and Open Meeting to be held on:

AUGUST 26 AND AUGUST 27, 1997

For more information, you may contact Docket Control at (602)542-3477 or the Hearing Division at (602)542-4250.

DOCKETED  
Arizona Corporation Commission

*Jack Rose*  
JACK ROSE  
EXECUTIVE SECRETARY

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 CARL J. KUNASEK  
CHAIRMAN  
3 JIM IRVIN  
COMMISSIONER  
4 RENZ D. JENNINGS  
COMMISSIONER

5 IN THE MATTER OF THE PETITION OF )  
6 MCIMETRO ACCESS TRANSMISSION )  
SERVICES, INC. FOR ARBITRATION OF )  
7 INTERCONNECTION RATES, TERMS AND )  
CONDITIONS PURSUANT TO 47 U.S.C. )  
8 § 252(b) OF THE TELECOMMUNICATIONS )  
ACT OF 1996. )  
9

DOCKET NO. U-3175-96-479  
DOCKET NO. E-1051-96-479

10 IN THE MATTER OF THE PETITION OF AT&T )  
COMMUNICATIONS OF THE MOUNTAIN )  
11 STATES, INC. FOR ARBITRATION OF )  
INTERCONNECTION RATES, TERMS, AND )  
12 CONDITIONS WITH U S WEST )  
COMMUNICATIONS, INC., PURSUANT TO )  
13 47 U.S.C. § 252(b) OF THE )  
TELECOMMUNICATIONS ACT OF 1996. )  
14

DOCKET NO. U-2428-96-417  
DOCKET NO. E-1051-96-417

**ORDER**

15 Open Meeting  
August 26 and 27, 1997  
16 Phoenix, Arizona

17 **BY THE COMMISSION:**

18 **DISCUSSION**

19 On July 29, 1996, AT&T Communications of the Mountain States, Inc. ("AT&T") filed with the  
20 Arizona Corporation Commission ("Commission") a Petition for Arbitration of Interconnection Rates,  
21 Terms and Conditions ("Petition") pursuant to 47 U.S.C. § 252(b) of the Telecommunications Act of  
22 1996 ("Act"), to establish an interconnection agreement with U S WEST Communications, Inc. ("U S  
23 WEST"). An arbitration was held on October 1 through 4, 1996. On December 10, 1996, the  
24 Commission issued Decision No. 59915 to resolve the issues submitted by the parties.

25 On September 4, 1996, MCImetro Access Transmission Services, Inc. ("MCI" or "MCIIm") filed  
26 a Petition to establish an interconnection agreement with U S WEST. An arbitration was held on October  
27 22, 23 and 24, 1996. On December 18, 1996, the Commission issued Decision No. 59931 to resolve the  
28 issues submitted by the parties.

1        Decision Nos. 59915 and 59931 instructed the parties to prepare and sign interconnection  
2 agreements incorporating the terms of the Commission's resolutions within thirty days of the date of the  
3 Decisions. Pursuant to the parties' request, the parties received additional time in which to submit  
4 executed interconnection agreements. The parties were unable to resolve many of the disputes which  
5 arose, and no signed interconnection agreement was filed. On February 25, 1997, AT&T and MCI filed  
6 a Joint Request for Approval of Interconnection Agreement ("Joint Request") which contained issues that  
7 had been resolved through arbitration or negotiation, and AT&T and MCI's proposed resolution of  
8 unresolved issues. AT&T and MCI requested that the unsigned Joint Request be approved as an  
9 interconnection agreement.

10        Also on February 25, 1997, U S WEST filed a Statement Pursuant to R14-2-1506, in which it  
11 requested the Commission to reject all contract language submitted by AT&T and MCI which had not  
12 been arbitrated or negotiated. U S WEST also requested the Commission reject the contract language  
13 based upon arbitrated issues for which it had requested rehearing. Alternatively, U S WEST urged the  
14 Commission to adopt language proposed by U S WEST for the unresolved issues.

15        By Procedural Order dated March 10, 1997, an arbitration between U S WEST, AT&T and MCI  
16 regarding the unresolved issues was scheduled. The arbitration was held as scheduled, and recessed  
17 periodically to allow the parties additional time to resolve issues and narrow the remaining disputes. The  
18 arbitration concluded on May 29, 1997, at which time the arbitrators ruled on many of the disputed  
19 issues. The remaining issues were ruled upon by Procedural Order dated July 14, 1997, after briefing  
20 by the parties. On July 18, 1997, the Eighth Circuit Court of Appeals issued its decision in *Iowa Utilities*  
21 *Board v. Federal Communication Commission*, Nos. 963321, *et al.*, 1997 WL 403401, (8th Cir. 1997),  
22 which vacated certain provisions of the FCC rules. Interconnection agreements which incorporated the  
23 issues resolved in Decision No. 59915 and 59931, the parties' negotiated provisions, and the rulings in  
24 the July 14, 1997 Procedural Order were submitted to the Commission at Open Meeting on July 30, 1997.

25        ...

26        ...

27        ...

28        ...

1 During Open Meeting, the parties framed an issue which had not arisen previously in its present  
 2 form, and requested that the issue be submitted for arbitration. By Decision No. 60308 (July 31, 1997),  
 3 the Commission adopted the rulings of the arbitrators, approved the interconnection agreements, and  
 4 submitted the following issue for arbitration:

5 the issues of combinations of network elements and whether the 1FB, 1FR<sup>1</sup> or other  
 6 finished service can be requested as an unbundled network element, in light of the recent  
 7 Court of Appeals 8th Circuit Opinion, with arbitrated contract language concerning those  
 issues to be incorporated into the interconnection agreements.

8 On July 31, 1997, the Commission issued a Procedural Order governing submission of the issue  
 9 for arbitration. On August 6, 1997, AT&T and MCI each filed a Supplemental Brief in response to the  
 10 Procedural Order, and U S WEST filed a Brief Regarding Effect of Eighth Circuit Opinion  
 11 Unbundling/Rebundling of Network Elements. On August 8, 1997, all parties filed Reply Briefs, and  
 12 oral argument was held by teleconference. The following is the Commission's resolution of the final  
 13 arbitrated issue arising from the requests of AT&T and MCI to arbitrate their interconnection agreements  
 14 with U S WEST.

15 **Issue: Combinations of network elements and whether 1FB and 1FR or other finished service can**  
 16 **be requested as an unbundled network element, in light of the recent Court of Appeals 8th Circuit**  
**Opinion.**

17 The FCC Rules stated:

18 § 51.315(a) An incumbent LEC shall provide unbundled network elements in a manner  
 19 that allows requesting telecommunications carriers to combine such network elements in  
 order to provide a telecommunications service.

20 § 51.315(b) Except upon request, an incumbent LEC shall not separate requested  
 network elements that the incumbent LEC currently combines.

21 § 51.315(c) Upon request, an incumbent LEC shall perform the functions necessary  
 22 to combine unbundled network elements in any manner, even if those elements are not  
 ordinarily combined in the incumbent LEC's network, provided that such combination  
 23 is:

- 24 (1) technically feasible; and
- (2) would not impair the ability of other carriers to obtain access to unbundled  
 network elements or to interconnect with the incumbent LEC's network.

25 §51.315(d) Upon request, an incumbent LEC shall perform the functions necessary  
 26 to combine unbundled network elements with elements possessed by the requesting  
 telecommunications carrier in any technically feasible manner.

---

27  
 28 <sup>1</sup> 1FB is U S WEST's standard business service, and 1FR is standard residential service.

1       §51.315(e)   An incumbent LEC that denies a request to combine elements pursuant to  
2       paragraph (c)(1) or paragraph (d) of this section must prove to the state commission that  
3       the requested combination is not technically feasible.

4       §51.315(f)   An incumbent LEC that denies a request to combine elements pursuant to  
5       paragraph (c)(2) of this section must prove to the state commission that the requested  
6       combination would impair the ability of other carriers to obtain access to unbundled  
7       network elements or to interconnect with the incumbent LEC's network.

8       The Decision of the Eighth Circuit Court of Appeals allowed Rules 51.315(a) and (b) to remain in effect,  
9       but vacated Rules 51.315(c)-(f).

10      U S WEST's position<sup>2</sup>

11       U S WEST asserted that the Eighth Circuit's Decision vacating Rules 51.315(c)-(f) found that  
12       incumbent local exchange carriers ("ILECs") do not have to do all the work to recombine elements and  
13       therefore, it is not obligated to combine elements to form a service platform or call path. U S WEST  
14       claimed that network elements are combined temporarily to build a path for the duration of each  
15       telephone call. U S WEST argued that services such as 1FB and 1FR must be purchased at wholesale  
16       for resale; or elements should have to be combined with a network dedicated for a competitive local  
17       exchange carrier's ("CLEC's") use or combined with facilities of a CLEC, in order to be sold as  
18       telecommunications services.

19       U S WEST alleged that AT&T and MCI seek to purchase services as unbundled elements for the  
20       purpose of avoiding contribution to universal service. U S WEST claimed that its current 1FB service  
21       price exceeds its cost, and thereby subsidizes universal service. If 1FB service were available to CLECs  
22       at cost-based prices for unbundled elements, U S WEST argued, it would be unable to compete with  
23       CLEC offerings of 1FB service or would have to request authority to lower its 1FB service rate, and as  
24       a result, the universal service subsidy would evaporate. U S WEST also alleged that offering service  
25       platforms as unbundled elements shifts the risk associated with fluctuations in demand capacity from the  
26       CLECs to U S WEST.

27       U S WEST argued that Rule 51.315(b) is subject to a narrow interpretation. U S WEST claimed

---

28       <sup>2</sup>   In its briefs, U S WEST broadened the scope of the issue to be arbitrated beyond that  
which was submitted by the Commission. We will address only the issue set forth in Decision No. 60308  
"combinations of network elements and whether 1FB, 1FR or other finished service can be requested as  
an unbundled network element, in light of the recent Court of Appeals 8th Circuit Opinion. . . ."

1 that the part of the FCC Order which explains Rule 51.315(b) is geared towards the situation where a  
2 State Commission has broken down FCC-defined network elements into multiple subelements, and  
3 prevents the ILEC from disaggregating the federally defined element into its state subparts absent CLEC  
4 approval.

5 AT&T's position

6 AT&T argued that both FCC Rule 51.315(b) and the nondiscrimination requirements of the Act  
7 prohibit U S WEST from disassembling presently combined network elements for sale to new entrants  
8 except at the new entrant's request.

9 AT&T indicated that the Eighth Circuit's Decision vacated solely the FCC provisions which  
10 required an ILEC to combine elements which are not normally combined in the ordinary course of the  
11 running of a network, and left intact the provision that an ILEC shall not separate requested network  
12 elements that it currently combines. The Eighth Circuit also held that a competing carrier may achieve  
13 the capability to provide telecommunications services solely through access to the unbundled elements  
14 of an ILEC's network. 1997 WL 403401, \*26.

15 AT&T also pointed out that the Eighth Circuit did not vacate FCC regulations that define  
16 individual network elements to include connections to adjacent elements, e.g. 47 C.F.R. § 51.319(a), (c)  
17 and (d), and access to separate adjacent elements, e.g., §51.319(e)(1)(ii) and (e)(2)(iii). AT&T also stated  
18 that the Eighth Circuit's Decision did not vacate an ILEC's duty to take whatever steps are required to  
19 allow CLECs to obtain access to network elements that are no less favorable than that which the ILEC  
20 provides to itself. Rule 51.313(b).

21 AT&T argued that no affirmative steps are required for an ILEC to discharge a duty when a  
22 CLEC orders network elements that are currently combined. AT&T claimed that it would be  
23 discriminatory when an new entrant places an order for an ILEC to disassemble the currently combined  
24 elements, only for the new entrant to then recombine them. AT&T asserted that U S WEST's position  
25 would require CLECs either purchase of dedicated facilities or finished services at resale, whereas the  
26 Act authorizes the capability to provide services completely through access to an ILEC's unbundled  
27 elements. *Iowa Utilities Board*, 1997 WL 403401, \*25.

28 AT&T claimed that, contrary to U S WEST's assertions, routing a call through a network is

1 determined by the functions of the switch and signaling system, not as a result of any performance by U  
2 S WEST to combine elements. The Eighth Circuit upheld the FCC's conclusion that a network element  
3 purchased by a CLEC includes the facilities and equipment that are used in the overall commercial  
4 offering of telecommunications. The Eighth Circuit rejected arguments that an element is limited to the  
5 physical parts of a network which are directly involved in transmitting telephone calls from one point to  
6 another, and decided that services such as operational support systems should be available as unbundled  
7 elements. 1997 WL 403401, \*25.

8 AT&T urged that the Commission reject U S WEST's assertion that a facility must be exclusively  
9 used by a CLEC for it to be a network element, and that a dedicated transportation network would have  
10 to be built in order for a CLEC to obtain transport as an unbundled network element. The signaling  
11 system, similar to a switch, cannot be partitioned so that a CLEC could have exclusive use to part of the  
12 facility. The requirement to construct a separate transportation network would be cost prohibitive, and  
13 would prevent a CLEC from being able to provide a switched service from unbundled elements, in  
14 violation of the Act, the FCC Order and the Eighth Circuit Opinion.

15 AT&T has not claimed that either 1FR or 1FB is a network element. AT&T has requested that  
16 it be permitted to purchase network elements that are combined in U S WEST's network, without U S  
17 WEST separating them for AT&T to recombine.

18 AT&T stated its willingness to comply with any universal service support system ordered by the  
19 Commission. AT&T indicated that present funding has been established by the Commission pursuant  
20 to A.A.C. R14-2-1204, not through any direct support from business to residential customers.

21 MCI's position

22 MCI argued similarly to AT&T that Rule 51.315(b) prevents U S WEST from separating  
23 requested elements which it currently combines, except upon request by a CLEC. MCI also claimed that  
24 the FCC Order Para. 295 was not a limitation upon the types of network elements that are combined by  
25 ILECs in general, but an example of combined network elements which would not be separated absent  
26 a request of a competitor.

27 MCI stated that it would be entitled to obtain combined elements which are combined by U S  
28 WEST for its own purposes. MCI claimed that if 1FR and 1FB are combined by U S WEST for itself,

1 then a CLEC would be entitled to those services as combined network elements.

2 In response to U S WEST's argument that MCI sought to purchase services as unbundled  
3 elements to avoid contribution to universal service, MCI assured the Commission that it was not  
4 attempting to avoid its universal service obligation. MCI is involved with the new task force to address  
5 universal service funding, and contributes to the fund as required.

6 Commission resolution

7 The FCC and the Eighth Circuit both agree that the Act § 251(c)(3) allows a requesting carrier  
8 access to an ILEC's unbundled elements which are sufficient to enable the carrier to provide  
9 telecommunications services. The Eighth Circuit also endorsed the FCC's statement that "the obligations  
10 imposed by sections 251(c)(2) and 251(c)(3) include modifications to incumbent LEC facilities to the  
11 extent necessary to accommodate interconnection or access to network elements." FCC Order, Para. 198,  
12 and 1997 WL 403401, \*32, fn 33. CLECs must be allowed access to switching and transport functions  
13 in order to be able to provide services completely through unbundled elements.

14 The Eighth Circuit vacated rules which required ILECs to actively combine network elements  
15 solely for the benefit of CLECs, such as elements which are not presently offered as combined. U S  
16 WEST urged the Eighth Circuit to overturn Rule 51.315(b), but the Eighth Circuit Decision left intact  
17 Rule 51.315(b), which requires ILECs to provide combinations of elements which currently are  
18 combined.

19 Furthermore, the Eighth Circuit Decision allows an ILEC to refuse to actively combine elements  
20 to create new services upon request by a CLEC, which would then be purchased at unbundled rates and  
21 marketed by CLECs. The function of a switch and related elements to combine to form a call path is not  
22 the type of combination which causes an ILEC to perform a duty to combine elements, but is an intrinsic  
23 function and capability of the elements themselves. The function need not be permanent or exclusively  
24 dedicated to any carrier, but is available when the element is purchased. As with switching or operator  
25 services in general, there is no requirement that a portion of the element be partitioned for the sole use  
26 of a CLEC.

27 Consistent with the Act, the FCC Rules, and the Eighth Circuit Opinion, we find that Rule  
28 51.315(b) allows a CLEC to order as combined those elements which an ILEC currently combines. The



Act enables a CLEC to purchase all of the elements necessary for a finished service on an unbundled basis. Therefore, the parties' interconnection agreements shall include the following language:

Attachment 3

1.2.2 U S WEST shall offer each Network Element individually and in Combinations as required by law, with any other Network Element or Network Elements in order to permit AT&T [MCI] to combine such Network Element or Network Elements obtained from U S WEST or with network components provided by itself or by third parties to provide Telecommunications Services to its subscribers. AT&T [MCI] may purchase unbundled Network Elements individually or in Combinations that U S WEST currently combines, without restrictions as to how those elements may be rebundled by AT&T [MCI].

Attachment 5

3.2.15.1 AT&T [MCI] may order individual and/or multiple unbundled Network Elements, and combinations of unbundled Network Elements as required by law, on a single order. AT&T [MCI] may order Unbundled Network Elements without restriction as to how those elements may be rebundled. Except upon request, U S WEST shall not separate network elements that are currently combined.

\* \* \* \* \*

Having considered the entire record herein and being fully advised in the premises, the Commission finds, concludes, and orders that:

**FINDINGS OF FACT**

1. U S WEST is certificated to provide local exchange and intraLATA telecommunications services to the public in Arizona, pursuant to Article 15 of the Arizona Constitution.
2. AT&T and MCI are certificated to provide local exchange and intrastate telecommunications services to the public in Arizona.
3. On July 29, 1996, AT&T filed with the Commission a petition for arbitration to establish an interconnection agreement with U S WEST.
4. On September 4, 1996, MCI filed with the Commission a petition for arbitration to establish an interconnection agreement with U S WEST.
5. On December 10, 1996, the Commission issued Decision No. 59915 which set forth its resolution of the issues in dispute between AT&T and U S WEST, and directed the parties to file a written interconnection agreement which included those terms which were voluntarily resolved between the parties and those on which the Commission directed a resolution.



interconnection agreements is just and reasonable, meets the requirements of the Act and all applicable laws, and is in the public interest.

6. The Commission maintains jurisdiction over the subject matter of the interconnection agreements and amendments thereto to the extent permitted pursuant to the powers granted the Commission by the Arizona Constitution, Statutes, Commission Rule and the Federal Act and rules promulgated thereunder.

**ORDER**

IT IS THEREFORE ORDERED that within thirty days from the date of this Decision, the parties shall incorporate within their interconnection agreements the language approved in the above Discussion, and file confirmation of such incorporation with the Commission.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY ORDER OF THE ARIZONA CORPORATION COMMISSION.

CHAIRMAN

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, JACK ROSE, Executive Secretary of the Arizona Corporation Commission, have hereunto set my hand and caused the official seal of the Commission to be affixed at the Capitol, in the City of Phoenix, this \_\_\_\_\_ day of \_\_\_\_\_, 1997.

JACK ROSE  
EXECUTIVE SECRETARY

DISSENT \_\_\_\_\_  
BMB:dap

SERVICE LIST FOR: MCIMETRO ACCESS TRANSMISSION SERVICES, INC.; AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC. and U S WEST COMMUNICATIONS, INC.

DOCKET NOS.: U-3175-96-479; E-1051-96-479; U-2428-96-417 and E-1051-96-417

LEX SMITH  
MICHAEL PATTEN  
BROWN & BAIN P.A.  
2901 N. CENTRAL AVE.  
PO BOX 400  
PHOENIX, ARIZONA 85001-0400  
ATTORNEYS FOR ACSI, ELI, COX AND TGC PHOENIX

TIMOTHY BERG  
FENNEMORE CRAIG  
3003 N CENTRAL AVE SUITE 2600  
PHOENIX, ARIZONA 85012-3913

WILLIAM OJILE, JR.  
NORTON CUTLER, JR.  
U S WEST COMMUNICATIONS, INC.  
1801 CALIFORNIA STREET, SUITE 5100  
DENVER, COLORADO 80202

JOAN S. BURKE  
2929 NORTH CENTRAL AVENUE, 21ST FLOOR  
P.O. BOX 36379  
PHOENIX, ARIZONA 85067-6379  
ATTORNEYS FOR AT&T COMMUNICATIONS OF THE MT.  
STATES, INC.

DANIEL WAGGONER  
MARY E. STEELE  
2600 CENTURY SQUARE  
1501 FOURTH AVENUE  
SEATTLE, WASHINGTON 98101-1688

ERIC J. BRANFMAN  
RUSSELL M. BLAU  
DOUGLAS G. BONNER  
SWIDLER & BERLIN CHARTERED  
3000 K STREET, N.W., SUITE 300  
WASHINGTON, D.C. 20007-5116  
ATTORNEYS FOR MFS COMMUNICATIONS COMPANY, INC.  
AND GST TUCSON LIGHTWAVE, INC.

DEBORAH S. WALDBAUM, ESQ.  
WESTERN REGION OFFICE  
201 NORTH CIVIC DRIVE, SUITE 210  
WALNUT CREEK, CALIFORNIA 94596

THOMAS H. CAMPBELL  
LEWIS & ROCA  
40 NORTH CENTRAL AVENUE  
PHOENIX, ARIZONA 85003  
ATTORNEYS FOR MCIMETRO ACCESS TRANSMISSION  
SERVICES, INC.

THOMAS F. DIXON, JR.  
MCI TELECOMMUNICATIONS CORPORATION  
707 SEVENTEENTH STREET  
DENVER, COLORADO 80202

THOMAS L. MUMAW  
SNELL & WILMER, L.L.P.  
1 ARIZONA CENTER  
400 EAST VAN BUREN  
PHOENIX, ARIZONA 85004-0001  
ATTORNEYS FOR BROOKS FIBER COMMUNICATIONS OF  
TUCSON, INC.

DONALD A. LOW  
SPRINT COMMUNICATIONS COMPANY, L.P.  
8140 WARD PARKWAY 5E  
KANSAS CITY, MISSOURI 64114

GREG PATTERSON  
RESIDENTIAL UTILITY CONSUMER OFFICE  
2828 N CENTRAL AVE, SUITE 1200  
PHOENIX, ARIZONA 85004

CARRINGTON PHILLIP  
COX COMMUNICATIONS, INC.  
1400 LAKE HEARN DRIVE  
ATLANTA, GEORGIA 30319

J WALTER HYER  
AT&T WIRELESS SERVICES, INC  
10210 NE POINTS DRIVE, SUITE 400  
KIRKLAND WASHINGTON 98033

JOSEPH S FABER  
DAVIS WRIGHT TREMAINE LLP  
ONE EMBARCADERO CENTER SUITE 600  
SAN FRANCISCO CALIFORNIA

JOHN LUNDIN  
GALLAGHER & KENNEDY  
2600 NORTH CENTRAL AVENUE  
PHOENIX ARIZONA 85004

With copies to:

MR JOHN KELLY  
EXECUTIVE ASSISTANT TO THE GOVERNOR  
OFFICE OF THE GOVERNOR  
1700 WEST WASHINGTON STREET  
PHOENIX AZ 85007

RICHARD SILVER MAN  
GENERAL MANAGER  
SALT RIVER PROJECT - PAB300  
P O BOX 52025  
PHOENIX AZ 85072-2025

MR CHARLES R MILLER  
AT&T COMMUNICATIONS OF  
THE MOUNTAIN STATES  
2800 NORTH CENTRAL AVENUE SUITE 828  
PHOENIX AZ 85004

MR RAYMOND HEYMAN  
ROSHKA HEYMAN & DEWULF  
400 NORTH 5TH STREET SUITE 1000  
PHOENIX AZ 85004

MS SUSAN MCADAMS  
ELECTRIC LIGHTWAVE  
P O BOX 4678  
VANCOUVER WA 98662

MR MICHAEL A MORRIS  
TCG (TELEPORT COMMUNICATIONS GROUP)  
201 N CIVIC DRIVE SUITE 210  
WALNUT CREEK CA 94596

ALAN SPARKS  
TECHNICAL OPERATIONS  
COX COMMUNICATIONS  
17602 NORTH BLACK CANYON HWY  
PHOENIX AZ 85023

MR MICHAEL GRANT  
JOHNSTON MAYNARD GRANT & PARKER  
2300 GREAT AMERICAN TOWER  
3200 NORTH CENTRAL AVENUE  
PHOENIX AZ 85012

MS JUDITH A D HOLCOMB  
U S WEST NEWVECTOR  
U S HWY 60 EAST OF MAGDALENA  
P O BOX 144  
MAGDALENA NM 87825

...

MS JOAN C HINSON  
TCA ARIZONA CHAPTER PRESIDENT  
TELECOMMUNICATIONS ASSOCIATION  
JOHN C LINCOLN HOSPITAL  
250 EAST DUNLAP  
PHOENIX AZ 85020

MR ROLLIE NEHRING  
ARIZONA TELEPHONE COMPANY  
5253 NORTH DROMEDARY ROAD  
PHOENIX AZ 85018

MS ELLEN CORKHILL  
COORDINATOR  
AARP  
5606 NORTH 17TH STREET  
PHOENIX AZ 85016

MR LEROY PILANT  
VALLEY TELEPHONE COOPERATIVE INC  
P O BOX 970  
752 EAST MALEY  
WILLCOX AZ 85644

MR KENNETH F MELLEY JR  
U S LONG DISTANCE INC  
9311 SAN PEDRO - SUITE 300  
SAN ANTONIO TX 78216

MS JEAN L KIDDOO ESQ  
SWIDLER & BERLIN CHARTERED  
3000 K STREET NW - SUITE 300  
WASHINGTON DC 20007-3841

MR BOB WHIPPLE  
STENOCALL  
1515 AVENUE J  
P O BOX 10127  
LUBBOCK TX 79408

MR MILE SCHULTIES  
TAFF MANAGER - REGULATORY  
ALLTEL SERVICE CORP  
1 ALLIED DRIVE  
LITTLE ROCK AR 72202

MR RICK MCALLISTER  
MANAGER REGULATORY  
ALLTEL WESTERN REGION  
P O BOX 3373  
LITTLE ROCK AR 72203-3373

MR STEVE WHEELER - ATTORNEY  
SNELL & WILMER  
ONE ARIZONA CENTER  
400 EAST VAN BUREN STREET  
PHOENIX AZ 85004-0001

MS BETH ANN BURNS - ATTORNEY  
CITIZENS UTILITIES COMPANY  
2901 N CENTRAL AVENUE - SUITE 1660  
PHOENIX AZ 85012-2736

ROD JORDAN  
CITIZENS UTILITIES COMPANY  
P O BOX 496020  
REDDING CA 96049-6020

JOE O'NEIL  
U S WEST NEWVECTOR GROUP  
MS B24  
P O BOX 96087  
BELLEVUE WA 98009-9697

MR FRANK HATZENBUEHLER  
U S WEST COMMUNICATIONS INC  
1801 CALIFORNIA STREET #5200  
DENVER CO 80202

MS. MAUREEN ARNOLD  
U S WEST COMMUNICATIONS  
3033 N 3RD STREET  
PHOENIX AZ 85012

MR JOE HANLEY MANAGER  
ARIZONA TELEPHONE COMPANY  
2236 WEST SHANGRI-LA ROAD  
PHOENIX AZ 85029

MR SCOTT RAFFERTY  
C/O AREIE GROUP  
4730 MASSACHUSETTS AVENUE  
WASHINGTON DC 20016

MR JAMAL ALLEN ATTORNEY  
O'CONNOR CAVANAUGH ANDERSON  
WESTOVER & BESHEARS  
ONE EAST CAMELBACK - SUITE 1100  
PHOENIX AZ 85012

MR TONY DITIRRO  
MCI COMMUNICATIONS CORPORATION  
201 SPEAR STREET 9TH FLOOR  
SAN FRANCISCO CA 94105

...

MR JOHN COLEMAN  
ELECTRIC LIGHTWAVE  
2600 NORTH CENTRAL AVENUE #300  
PHOENIX AZ 85004

MR ERIC ARTMAN  
MFS COMMUNICATIONS CO INC  
185 BERRY ST., BLDG 1  
SUITE 5100  
SAN FRANCISCO CA 94107

MR JOHN O LAUE  
COMMUNICATIONS ENGINEERING SUPERVISOR  
CITY OF TEMPE  
MANAGEMENT SERVICES DEPARTMENT  
132 EAST 6TH STREET SUITE B109  
TEMPE AZ 85280

MR JOE HOMMEL  
ELECTRIC LIGHTWAVE  
8100 N E PARKWAY DRIVE SUITE 200  
VANCOUVER WA 98662

MR FRED M SHEPHERD NCE  
TELEPHONE DIVISION MANAGER  
TOHONO O'ODHAM UTILITY AUTHORITY  
P O BOX 816  
SELLS AZ 85634

MR DAREL ESCHBACH  
EXECUTIVE DIRECTOR  
TELECOMMUNICATIONS SERVICES  
ARIZONA STATE UNIVERSITY  
BOX 870201  
TEMPE AZ 85287-0201

MR JIM BROSHAR  
EXECUTIVE VICE PRESIDENT  
ROCKY MOUNTAIN TELECOM ASSOCIATION  
10105 EAST VIA LINDA SUITE 103-340  
SCOTTSDALE AZ 85258

MR TIM DELANEY  
BROWN & BAIN PA  
2901 NORTH CENTRAL  
P O BOX 400  
PHOENIX AZ 85001-0400

MR PAUL SCHNEIDER  
ARIZONA BUSINESS GAZETTE  
P O BOX 1950  
PHOENIX AZ 85001

MR JEFFREY WEIR  
EXECUTIVE DIRECTOR  
SOUTHERN GILA COUNTY  
ECONOMIC DEVELOPMENT CORPORATION  
P O BOX 1351  
GLOBE AZ 85502

MS SUE WILLIAMS  
DIRECTOR REGULATORY AFFAIRS  
TELTRUST COMMUNICATIONS SERVICES INC  
221 NORTH CHARLES LINDBERGH DRIVE  
SALT LAKE CITY UT 84116

MR MIKE LAUGHLIN  
DIRECTOR OF OPERATIONS  
NORSTAN COMMUNICATIONS  
6900 WEDGEWOOD ROAD  
MAPLE GROVE MN 55311

MR IVAN JOHNSON  
VICE PRESIDENT OF PUBLIC AFFAIRS  
TIMES MIRROR CABLE TELEVISION  
17602 NORTH BLACK CANYON HIGHWAY  
PHOENIX AZ 85023

JIM WORTHAM  
ADMINISTRATOR  
FIRE DEPARTMENT COMPUTER SERVICES  
CITY OF PHOENIX  
150 S 12TH STREET  
PHOENIX AZ 85034

CATHERINE A NICHOLS  
TEP - LEGAL DEPARTMENT  
220 WEST SIXTH STREET  
P O BOX 711  
TUCSON ARIZONA 85702

TERRY TRAPP, PRESIDENT  
U S COMMUNICATIONS UNLIMITED, INC  
274 SNYDER MOUNTAIN ROAD  
EVERGREEN COLORADO 80439

J SCOTT NICHOLS  
U S ONE COMMUNICATIONS  
1320 CHAIN BRIDGE RD SUITE 350  
MCLEAN VIRGINIA 22101

TERRY ROSS  
CENTER FOR ENERGY & ECONOMIC DEV  
7853 E ARAPAHOE COURT SUITE 2600  
ENGLEWOOD COLORADO 80112

...

PETER GLASER  
DOHERTY RUMBLE & BUTLER  
1401 NEW YORK AVE N W SUITE 1100  
WASHINGTON DC 20005

TOM BADE  
GREG RIGGLE  
GCB COMMUNICATIONS  
1025 E BROADWAY SUITE 201  
TEMPE ARIZONA 85282

MARTIN A ARONSON  
WILLIAM D CLEVELAND  
ANGELA M CASTELLANO  
BEUS GILBERT & MORRILL  
3200 N CENTRAL SUITE 1000  
PHOENIX ARIZONA 85012

JENNIFER S POMERY  
U S WEST CELLULAR  
3350 161ST AVENUE SE  
P O BOX 96087  
BELLEVUE WASHINGTON 98009

JODIE CARO  
MFS COMMUNICATIONS CO INC  
999 OAKMONT PLAZA DR APT 400  
WESTMONT ILLINOIS 60519-5516

IAN CALKINS  
PUBLIC AFFAIRS DIRECTOR  
PHOENIX CHAMBER OF COMMERCE  
201 N CENTRAL AVE 27TH FLOOR  
PHOENIX ARIZONA 85073

JACK TRAHAN  
WESTERN ELECTRONICS AND  
COMMUNICATIONS  
2332 KINGMAN AVENUE  
KINGMAN ARIZONA 86401

CINDY Z SCHONHAUT  
MFS COMMUNICATIONS CO INC  
3000 K STREET N W SUITE 300  
WASHINGTON DC 20007

JESSE W SEARS  
ASSISTANT CHIEF COUNSEL  
CITY ATTORNEY'S OFFICE  
CITY OF PHOENIX  
200 WEST WASHINGTON, 13TH FLOOR  
PHOENIX ARIZONA 85003-1611

1 PETER Q NYCE JR  
2 REGULATORY LAW OFFICE  
3 U S ARMY LITIGATION CENTER  
4 901 N STUART STREET SUITE 713  
5 ARLINGTON VA 22203-1837

6 CHARLES L BEST  
7 ATTORNEY AT LAW  
8 1220 S W MORRISON ST SUITE 805  
9 PORTLAND OR 97205

10 WILLIAM POLLARD  
11 KLP & ASSOCIATES  
12 8526 TORWOODLEE COURT  
13 DUBLIN OHIO 43017-9739

14 GARY YAQUINTO  
15 GST TELECOM  
16 ONE ARIZONA CENTER  
17 400 E VAN BUREN SUITE 350  
18 PHOENIX ARIZONA 85004

19 BILL MEEK  
20 AUIA  
21 2100 N CENTRAL AVE SUITE 210  
22 PHOENIX ARIZONA 85004

23 JANET REGNER  
24 BETTY PRUITT  
25 ACAA  
26 202 E MCDOWELL #255  
27 PHOENIX ARIZONA 85004

28 LINDY FUNKHOUSER, CHIEF COUNSEL  
LEGAL DIVISION  
ARIZONA CORPORATION COMMISSION  
1200 WEST WASHINGTON STREET  
PHOENIX, ARIZONA 85007

CARL DABELSTEIN  
DIRECTOR UTILITIES DIVISION  
ARIZONA CORPORATION COMMISSION  
1200 WEST WASHINGTON STREET  
PHOENIX, ARIZONA 85007